

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

TIMOTHY P. NEUMANN, ESQ. [TN6429]
BROEGE, NEUMANN, FISCHER & SHAVER, L.L.C.
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*Attorneys for Avraham Manheim and Sylvia Manheim,
Debtors and Debtors-in-possession*

In Re:

AVRAHAM MANHEIM AND
SYLVIA MANHEIM,

Debtors.

Chapter 11

Case No.: 17-33851

**CERTIFICATION OF TIMOTHY P. NEUMANN IN OPPOSITION TO MOTION OF THE
ACTING UNITED STATES TRUSTEE FOR AN ORDER DISMISSING THE CASE
PURSUANT TO 11 U.S.C. §1112(b)**

I, Timothy P. Neumann, certify as follows:

1. I am an attorney at law of the State of New Jersey, associated with the law firm of Broege, Neumann, Fischer & Shaver (“BNFS”) attorneys for the Debtors in the above matter.

2. I submit this certification in opposition to the Trustee’s Motion For An Order Dismissing The Case (the “Motion”).

3. The basis for the Trustee’s Motion is that the Debtors have not attended the 341a meeting of creditors, and that no monthly operating reports for November 2017 and December 2017 have been filed.

4. Since the filing of the Motion, the Debtors have attended their 341a meeting and on February 8, 2018 filed their monthly operating reports for November 2017, December 2017 and January 2018 [Docket Nos. 89, 90]. Supplements to the December 2017 and January 2018 reports were filed on February 22, 2018 [Docket nos. 97, 98, 99].

5. I have been advised that the Debtors are working on their February MOR but that the Passover holiday has caused a delay. The Debtors nevertheless anticipate having the February Report filed prior to the present return date of April 16, 2018.

I hereby certify that the foregoing statements are true and correct. I am aware that if any of the foregoing statements are wilfully false, I am subject to punishment.

BROEGE, NEUMANN, FISCHER & SHAVER, LLC
Attorneys for Debtor

BY: /s/Timothy P. Neumann
TIMOTHY P. NEUMANN

Dated: April 12, 2018